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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI OXFORD DIVISION

TERRY TYLER PLAINTIFF

v. CIVIL ACTION NO.: 3:18-cv-34-NBB-RP

TALLAHATCHIE COUNTY SHERIFF'S OFFICE, et al.

DEFENDANTS

JOINT MOTION FOR AGREED PROTECTIVE ORDER

COME NOW, Plaintiff, Terry Tyler, and Defendants, Tallahatchie County Sheriff's Office and Sheriff William Brewer, Jr., in his official and individual capacity, in the above numbered and styled cause, and move the Court under Federal Rule of Civil Procedure 26(c), for entry of the Agreed Protective Order establishing procedures for the protection of confidential documents and information, and, in support thereof, would show as follows:

- 1. The parties began discovery in this matter and determined that such discovery will require the disclosure of confidential materials which are entitled to protection from public disclosure.
- 2. In order to facilitate the prompt production of discovery materials and resolution of disputes over confidentiality, adequately protect material entitled to be kept confidential, and ensure that protection is afforded only to material so entitled, the parties have conferred and agree upon the procedures set forth in the Agreed Protective Order submitted to the Court.
- 3. This Court has the authority to enter the attached Agreed Protective Order pursuant to Federal Rule of Civil Procedure 26(c)(1).

4. Due to the nature of this Motion, the parties request that they be relieved of the requirement to submit a supporting memorandum pursuant to L.U.Civ.R. 7(b)(4).

WHEREFORE PREMISES CONSIDERED Plaintiff and Defendants respectfully request that the Court enter the Agreed Protective Order submitted hereto and that this Court grant such other further and different relief as this Court deems fair and just.

THIS the 27th day of April 2018.

Respectfully submitted,

s/Nick Norris

Nick Norris (MSB #101574)
WATSON & NORRIS, PLLC
1880 Lakeland Drive, Suite G
Jackson, Mississippi 39216-4972
Telephone: (601) 968-0000

Facsimile: (601) 968-0010 nick@watsonnorris.com

s/Timothy M. Peeples

Timothy M. Peeples (MSB #100103) DANIEL COKER HORTON & BELL, P.A. 265 North Lamar Boulevard, Suite R P.O. Box 1396 Oxford, Mississippi 38655

Telephone: (601) 232-8979 Facsimile: (662) 232-8940 tpeeples@danielcoker.com

CERTIFICATE OF SERVICE

I, NICK NORRIS, attorney for the Plaintiff, do hereby certify that I have this day served via ECF filing or by United States mail, postage prepaid, a true and correct copy of the above and foregoing document to all counsel of record.

SO CERTIFIED, this the 27th day of April 2018.

s/Nick Norris NICK NORRIS